

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
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SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:
VICTOR HERNANDEZ

Case No.: 21-18814SLM

HEARING DATE: 01/12/2022

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The plan does not appear to be feasible pursuant to 11 U.S.C. Section 1325(a)(6), as the debtor will be unable to make payments under the plan and to comply with the plan.
- Specifically,
 - insufficient income to make plan payments and no 341a conducted.
- A review of Schedules I+J show no surplus available to fund the debtor's plan.
- The Debtor has failed to make all pre-confirmation required payments to the Standing Trustee pursuant to 11 U.S.C. Section 1326.
 - Specifically, none made.
- All documentation needed to conduct a 341a meeting has not been uploaded. Also, the secured creditor's objection has not and cannot be satisfied based on the budget as filed under oath. It does not appear that debtor owns the realty in question either.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied and the case be dismissed.

Dated: January 06, 2022

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee